

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TEAM NEW ZEALAND LIMITED, :
Plaintiff, : Case Nos. 08-Civ-2228, 08-Civ-4215
v. :
SOCIÉTÉ NAUTIQUE DE GENÈVE, TEAM :
ALINGHI, S.A., AC MANAGEMENT, S.A., :
and ERNESTO BERTARELLI, :
Defendants :
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NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the Memorandum of Law of Société Nautique de Genève (“SNG”), Team Alinghi, S.A. (“Alinghi”), AC Management, S.A. (“ACM”), and Ernesto Bertarelli (collectively, “Defendants”), in support of Defendants’ Motion to Compel Arbitration, filed concurrently herewith, Defendants will move this Court before Hon. William H. Pauley III, at the United States Courthouse, 500 Pearl Street, Room 2210, New York, New York, 10007, for an order compelling arbitration of the claims raised in Plaintiff Team New Zealand Ltd.’s two related actions, *Team New Zealand Ltd. v. Société Nautique de Genève et al.*, No. 08-Civ.-2228 and *Team New Zealand Ltd. v. Société Nautique de Genève et al.*, No. 08-Civ.-4215.

Dated: New York, New York
July 3, 2008

Respectfully submitted,
SIMPSON THACHER & BARTLETT LLP

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**Attorneys for Defendants Société Nautique de
Genève, Team Alinghi, S.A., AC Management,
S.A., and Ernesto Bertarelli**